UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Lead and Copper Rule Compliance Data
75 Hawthorne Street (W-6-2)
San Francisco, CA 94105

October 27, 1995

SUBJECT: Violations of the Safe Drinking Water Act

Dear Owner\Operator,

Small drinking water systems serving 25-3,300 people (or having at least 15 connections) are required to conduct lead and copper tap sampling. The results of the first round of lead and copper tap sampling were due to the U.S.Environmental Protection Agency ("EPA") on or before January 11, 1994, and the second round of sampling on or before July 11, 1994.

Our records indicate that you have not done lead and copper tap sampling. Therefore, you are in violation of the Safe Drinking Water Act's lead and copper rule. This notice is designed to help you return to compliance.

If you **have** sampled for lead and copper, please complete the enclosed two (2) forms and submit the forms and your lab data to our address as shown above by **November 17, 1995.**

If you **have not** sampled for lead and copper, complete and return the enclosed survey to EPA at the above address by November 17, 1995, conduct your sampling (**please read carefully** the enclosed instructions on how to do sampling), then by **December 1, 1995,** submit your lab data and the enclosed 141a form to EPA. If you do not exceed the action levels in the first round of sampling, do a second round of sampling at the same taps, complete the enclosed forms and your lab data to the above address by **February 2, 1996.**

Failure to supply all data by February 2, 1996, may subject you to formal enforcement. EPA is authorized to issue an administrative order or commence a civil action. Violations of the Safe Drinking Water Act or its implementing regulations may subject you to: (i) an administrative civil penalty of up to a total of $5,000; or (ii) a civil penalty of up to $25,000 per day per violation for each day in which a violation occurs as assessed by an appropriate United States district court .

EPA is monitoring compliance with the lead and copper rule until California adopts the regulations. If you need assistance from EPA, please indicate this by checking the appropriate box at the bottom of the enclosed survey. We want to assist you with returning to compliance and will phone you as soon as we can. We appreciate your immediate attention to this matter.

Sincerely,

Loretta Kahn Barsamian

Loretta Kahn Barsamian, Chief
Drinking Water Protection Branch

Enclosures

GUIDANCE FOR SMALL WATER SYSTEMS TO COMPLY WITH THE LEAD (Pb) AND COPPER (Cu) REQUIREMENTS

I. OVERVIEW

The first round of sampling was required to be completed by December 31, 1993, and the second round by June 30, 1994.

The lead and copper rule requires:

A. Selecting sampling sites;
B. Collecting and analyzing samples;
C. Determining if the 90th percentile sample exceeds the lead action level of 0.015 mg/l or the copper action level of 1.3 mg/l;
D. Reporting the results; and
E. Taking any necessary follow-up action.

II. NUMBER OF SAMPLES

The necessary number of samples depends on the number of people served by the system. Samples must be taken from the following number of sampling sites:

Number of People served	Number of samples
501 to 3,300	20
101 to 500	10
Less than or equal to 100	5

III. WHERE TO SAMPLE

A. Sampling sites shall be selected based on a tier system. If possible, all samples should be taken from tier I sites. If there are not enough tier I sites, samples should be taken from tier II sites, etc.

1. Tier I consists of single family structures that contain:
   a. lead pipes; and/or
   b. copper pipes with lead solder installed after 1982 through 1988; and/or
   c. pipes served by a lead service line.

   If lead service lines are present, at least half of the samples must come from the sites with lead service lines.

2. Tier II consists of buildings and multiple family residences that contain:
   a. copper pipes with lead solder installed after 1982 through 1988; and/or
   b. served by a lead service line.

3. Tier III consists of single family residences that contain copper pipes with lead solder installed before 1983.

4. In the event that there are insufficient tier I, II and III sites, sites should be selected in the following priority:

a. copper pipe installed after 1988
b. galvanized piping
c. plastic piping

Sampling sites should be spread throughout the water system, if possible.

IV. HOW TO SAMPLE

Note: Each round of lead and copper sampling should be done at the same residences as the initial monitoring whenever possible. Letters are usually sent to find volunteers to participant in the sampling and then residents collect the samples themselves. Sample bottles and instruction are then retrieved by employees.

A. TAP/FAUCET SAMPLES

1. Samples are to be taken from kitchen or bathroom taps/faucets. Do not sample from taps that have point-of-use treatment (e.g. water softeners; carbon filter systems, etc.). If possible, remove any screens, filters, or aerators from faucet nozzle prior to sampling.
2. All samples must be one liter in volume.
3. The sampling tap must not be used for a ***minimum of 6 hours and a maximum of 18 hours prior to sampling***. If it is uncertain when the tap was last used, it should be flushed and the water in the system should be left to stand still for the required six hours prior to sampling. Recommendation: Collect samples first thing in the morning.
4. Samples must be the first water drawn from the tap.
5. Sample analysis must be conducted by a laboratory certified by the state to conduct drinking water lead and copper analyses.

B. LEAD SERVICE LINES SAMPLES

The objective is to attempt to obtain a sample of the water that was sitting in the lead service line portion of the pipe for at least six hours.

1. Samples should be taken in one of the following two ways:
   a. sample from the tap after flushing a volume equal to the volume of water between the tap and the service line. The volume shall be calculated based on the interior diameter and length of the pipe between the tap and the lead service line or
   b. tap directly into the lead service line.
2. All samples must be one liter in volume.
3. The water from the system must not be used for a ***minimum of 6 hours and a maximum of 18 hours prior to sampling***. If it is uncertain when the tap was last used, then it should be flushed and the water in the system should be left to stand still for the required six hours prior to sampling.
4. Sample analysis must be conducted by a laboratory certified by the state to conduct drinking water lead and copper analyses.

Suggested Protocol for Homeowner Tap Sample Collection

These samples are being collected to determine lead and copper levels in your tap water. This sampling effort is required by the Environmental Protection Agency and is being accomplished through the cooperation of homeowners and residents.

Collect samples after an extended period of stagnant water conditions (i.e., no water use during this period) within the interior piping. Due to this requirement, the best time to collect samples is either early in the morning or in the evening upon returning from work. The collection procedure is described in more detail below.

1. Make arrangements in advance to set dates for sample kit delivery and pick-up by water department staff.

2. Achieve a minimum of 6-8 hours during which there is no water use prior to sampling. The water department recommends that either early mornings or evenings upon returning home are the best sampling times to ensure that the necessary stagnant water conditions exist.

3. Use kitchen or bathroom cold-water faucet for sampling. Place the sample bottle (open) below the faucet and gently open the cold water tap. Fill the sample bottle to the line marked "1000-mL" and turn off the water.

4. Tightly cap the sample bottle and place it in the sample kit provided. Please review the sample kit label at this time to ensure that all information contained on the label is correct.

5. If any plumbing repairs or replacement has been done in the home since the previous sampling event, note this information on the label, as provided.

6. Place the sample kit outside of the residence in the location of the kit's delivery in order that department staff may pick up the sample kit.

7. Results from this monitoring effort will be provided to participating customers when reports are generated for the State unless excessive lead and/or copper levels are found. In those cases, immediate notification will be provided (usually 10 working days from the time of sample collection).

Call _____ at _____ if you have any questions regarding these instructions.

SAMPLE LABEL: TO BE COMPLETED BY RESIDENT

Water was last used: Time:_____ Date:_____

Sample was collected: Time:_____ Date:_____

I have read the above directions and have taken a tap sample in accordance with these directions.

_____ Date:_____

Signature